

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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INDEPENDENT ASSET MANAGEMENT)	Case No. 1:07-cv-06431-JSR
LLC and OLA HOLMSTROM,)	
)	ECF
)	
Plaintiffs,)	
)	
vs.)	
)	
DANIEL ZANGER,)	
)	
Defendant.)	
)	
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**DECLARATION OF MICHAEL D. SILBERFARB IN SUPPORT OF DEFENDANT'S
OPPOSITION TO PLAINTIFF'S MOTION FOR PARTIAL SUMMARY
JUDGMENT AND IN SUPPORT OF DEFENDANT'S MOTION
FOR PARTIAL SUMMARY JUDGMENT**

I, Michael D. Silberfarb, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am an associate at the law firm Jones Day, attorneys for defendant Daniel Zanger. I submit this declaration in support of Defendant's Opposition to Plaintiff's Motion for Partial Summary Judgment and in Support of Defendant's Motion for Partial Summary Judgment.

2. Attached to this declaration, under the identified exhibit tabs, are true and correct copies of the following documents:

Exhibit A	Transcript of Deposition of George Szele, dated March 5, 2008
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Exhibit B	Transcript of Deposition of George Szele, dated April 17, 2008
Exhibit C	Transcript of Deposition of Joseph Porco, dated March 3, 2008
Exhibit D	Excerpts from Deposition of Ezra Zask, dated March 25, 2008
Exhibit E	Letter from George Szele and Joseph Porco to the Securities and Exchange Commission, dated January 24, 2006
Exhibit F	Expert Report of Raymond L. Aronson
Exhibit G	Letter from Craig Stuart Lanza to Michael D. Silberfarb, dated April 25, 2008
Exhibit H	Prime Broker Agreement between Goldman Sachs Execution & Clearing, L.P. and IAM
Exhibit I	Expert Report of Ezra Zask
Exhibit J	Email from Siu Kei Chung to Anthony Will and George Szele, dated February 2, 2005
Exhibit K	Email from George Szele to Stephane Veniza, dated November 7, 2006.
Exhibit L	E-mail from Gianina Arturo to George Szele, dated December 13, 2008
Exhibit M	Email from Gianina Arturo to George Szele, Joseph Porco, and Stephane Veniza, dated July 10, 2006; Email from IAM Fund to Gianina Arturo, dated April 10, 2006; Email from Gianina to Daniel Zanger, George Szele, and Joseph Porco, dated January 12, 2006.
Exhibit N	Excerpts from Oral Argument Transcript, dated October 4, 2007
Exhibit O	IAM's Accounting Document

3. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: April 28, 2008
New York, New York

s/ Michael D. Silberfarb

CERTIFICATE OF SERVICE

The foregoing Declaration of Michael D. Silberfarb, dated April 28, 2008 and the exhibits annexed thereto, were served on the following counsel of record on April 28, 2008 via the method listed below:

E-Mail and United States Mail

John Balestriere, Esq.
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s/ Michael D. Silberfarb
